

Surviving the DHEC Inspection



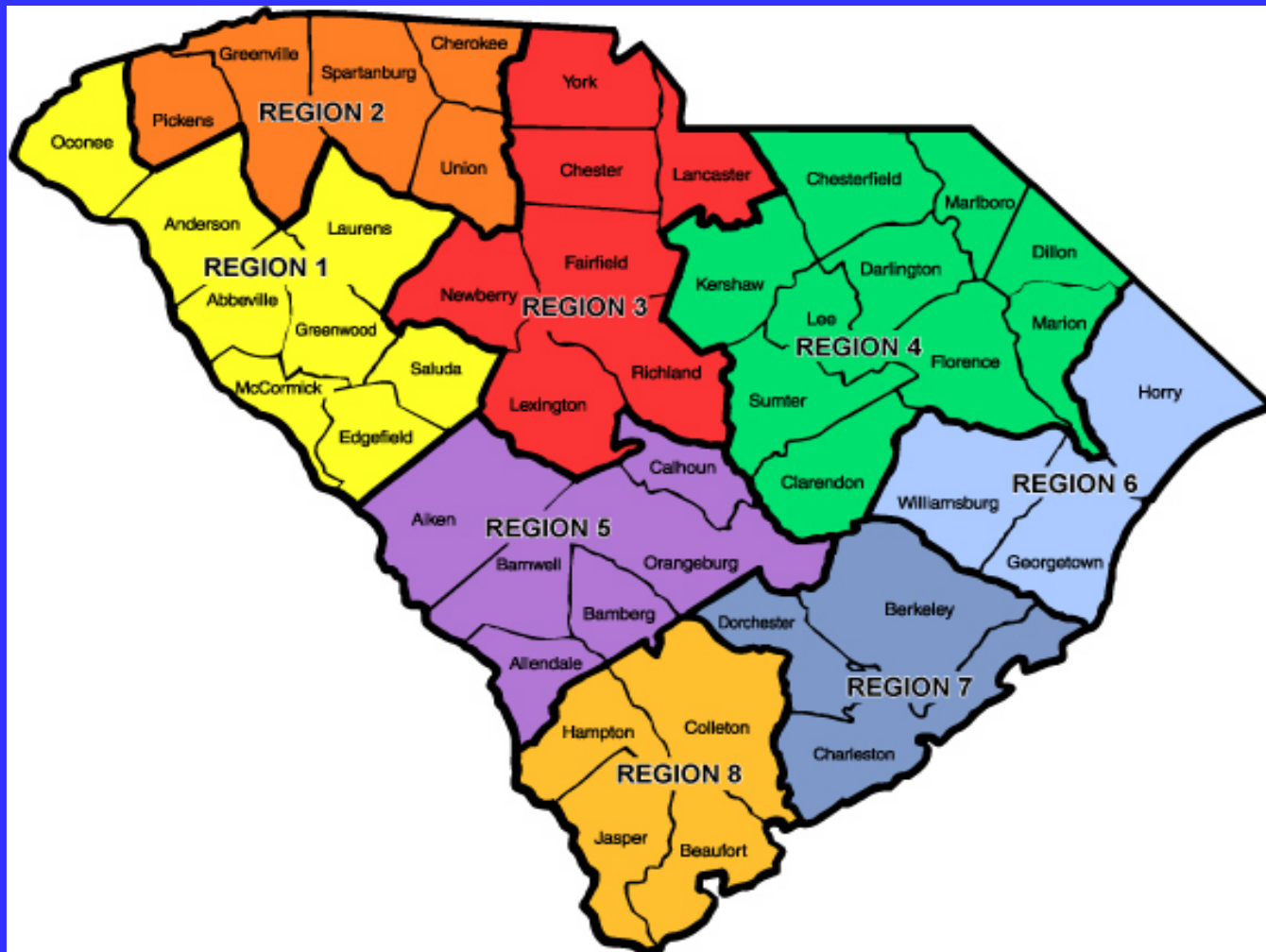
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Bureau of Environmental Services



What are an inspector's main goals?

- Ensuring compliance with permit requirements and regulations
- Reporting facts accurately

How is the typical hazardous waste inspection performed and what does an inspector look for?

Inspection Meeting

- Discuss inspection objectives and scope.
- Discuss and review the facility records.
 - Manifest
 - Quarterly Reports
 - Employee Training
 - Contingency Plan

Facility Site Review

- Conduct visual inspection of facility
 - Satellite accumulation areas
 - 90 day storage areas
 - Waste tanks and ancillary equipment
 - Rail cars (off loading and loading areas)
 - Contractor maintenance areas

Closing Inspection Meeting

- Collect missing or additional information
- Clarify questions
- Review inspection findings

Top Five Most Common Problems

5. Consolidating reports in one general location or file so they can be readily available at all times.
4. Proper drum labeling and closure
3. Failure to familiarize and make arrangements with local authorities in regard to Emergency Plans and the potential need for services of these organizations
2. Employee training
1. Satellite accumulation--Exceeding the allowable quantity of waste

How is the typical Air Quality inspection performed and what does an inspector look for?

Air Quality inspections.....

- Performed unannounced
- Combustion emission sources
- Stacked emission sources
- Fugitive emission sources
- VOC and HAP emission sources

Opening Inspection Meeting

- Discuss inspection objectives and scope.
- Discuss and review the facility records.
 - Pollution Control Device Records
 - Maintenance Records
 - Monitoring Records
 - Quarterly, Semi-Annual, Annual Reports

Facility Site Review

- Conduct visual inspection of facility
 - Inventory of permitted sources
 - Inspection of pollution control devices
 - Recording of Monitoring Parameters
 - Visible Emission Observations

Closing Inspection Meeting

- Collect missing or additional information
- Clarify questions
- Review inspection findings

Top Five Most Common Problems

5. Pollution control device malfunctions
4. Missing or late reports
3. Improper or missing recordkeeping
2. Unpermitted equipment
1. Not reading or understanding permits

How is the typical water inspection performed and what does an inspector look for?

WATER INSPECTIONS

- DOMESTIC & INDUSTRIAL WASTEWATER TREATMENT FACILITIES
- COLLECTION SYSTEM
- SEDIMENT & EROSION CONTROL
- DRINKING WATER

COMPLIANCE MONITORING INSPECTIONS

- Wastewater Inspections
 - Industrial Stormwater Inspections
 - General Permit Inspections
 - Construction Stormwater Inspections
- Complaints & Sanitary Sewer Overflows (SSO)



WASTEWATER INSPECTION

- NPDES Permit
- Records & Reports Review
- Facility Site Review
- Collection System
- Flow Measurement
- Self-Monitoring
- Compliance Schedules
- O & M
- Sludge Handling/Disposal
- Effluent Compliance Monitoring (2-3 days)
- Laboratory Review
- Risk Management (112r)



SEDIMENT & EROSION CONTROL IS ...

- Proper controls of any runoff to prevent impact to public health, wetlands and physical property
- Performed on new construction active in the State

SEDIMENT & EROSION CONTROL INSPECTIONS

- Insure that the approved SWP3 and Sediment & Erosion Control plans are on site and are being complied with.
- Insure that the approved plans have been properly implemented and maintained.
- Follow-up inspections

Groundwater (Public Wells) Sanitary Survey

- Inspect All Groundwater and Master meter Sources
- Inspect Chemical Treatment and Processes
- Inspect Distribution Facilities
- Inspect Storage Facilities

Groundwater (Public Wells) Sanitary Survey

- Review Water Quality Sampling and Testing Records
- Review Procedures Manual & Programs
- Verify DHEC's Inventory Information
- Identify Deficiencies
- Review other pertinent records

Most Common Problems

- Not following/complying with permit
- Not conducting routine maintenance on distribution or collection system – preventative maintenance
- Not keeping records up to date or available
- Not maintaining a current map or updating map or plans
- Failing to contact SCDHEC during emergency situation(s)
- Operator errors/facility issues

Regional Office Contact Information

Region 1

Anderson, 864-260-5569

Greenwood, 864-233-0333

Region 2

Greenville, 864-241-1090

Spartanburg, 864-596-3800

Region 3

Columbia, 803-896-0620

Lancaster, 803-285-7461

Region 4

Florence, 843-667-4825

Sumter, 803-778-6548

Regional Office Contact Information

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| Region 5 |
| Aiken, 803-641-7670 |
| Region 6 |
| Myrtle Beach, 843-238-4378 |
| Region 7 |
| Charleston, 843-740-1590 |
| Region 8 |
| Beaufort, 843-846-1030 |